

Exhibit 19

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12)

13 TUESDAY, JANUARY 8, 2019

14
15 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
16 CONFIDENTIALITY REVIEW

17 - - -

18 Videotaped deposition of Ginger
19 Collier, held at the offices of STINSON
20 LEONARD STREET LLP, 7700 Forsyth Boulevard,
21 Suite 1000, St. Louis, Missouri, commencing
22 at 9:10 a.m., on the above date, before
23 Carrie A. Campbell, Registered Diplomate
24 Reporterand Certified Realtime Reporter.
25

26 - - -

27 GOLKOW LITIGATION SERVICES
28 877.370.3377 ph | 917.591.5672 fax
29 deps@golkow.com
30

1	MR. O'CONNOR:	Object to form.	15:27:53
2	THE WITNESS:	I don't remember.	15:27:54
3	QUESTIONS BY MR. GOTTO:		15:27:55
4	Q.	Okay. Do you know what opioid	15:27:55
5		rotation means in the context of this mailer?	15:27:57
6	A.	No, I do not.	15:28:00
7	Q.	Okay. And down toward the	15:28:02
8		bottom of the mailer it says, "This activity	15:28:04
9		is funded through an educational grant from	15:28:06
10		Mallinckrodt/Covidien."	15:28:11
11		Do you see that?	15:28:12
12	A.	Yes.	15:28:13
13	Q.	And educational grants of that	15:28:13
14		type, is that something that was handled by	15:28:17
15		the marketing department?	15:28:20
16	A.	Not in my group, because this	15:28:21
17		is targeting physicians. We don't target	15:28:25
18		physicians at all. We don't even talk to	15:28:27
19		them.	15:28:29
20	Q.	Okay. So whatever educational	15:28:29
21		grant underlay this presentation would have	15:28:33
22		been something that someone else handled?	15:28:35
23	A.	Correct.	15:28:37
24	Q.	Okay. All right. You can set	15:28:37
25		that aside.	15:28:41